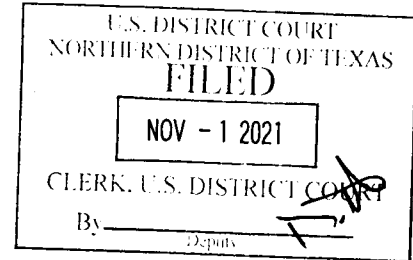


IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION



UNITED STATES OF AMERICA,
THE STATE OF TEXAS, AND THE
STATE OF LOUISIANA, *ex rel.*
ALEX DOE

Plaintiffs/Relator

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH TEXAS,
INC., PLANNED PARENTHOOD
CAMERON COUNTY, INC., AND
PLANNED PARENTHOOD SAN
ANTONIO, INC.

Defendants.

CIVIL ACTION No. 2:21-CV-022-Z

FILED UNDER SEAL

THE STATE OF TEXAS'S NOTICE OF ELECTION TO INTERVENE

Pursuant to the Texas Medicaid Fraud Prevention Act ("TMFPA"), Tex. Hum. Res. Code § 36.104(a)(1), the State of Texas notifies the Court of its intention to intervene in and proceed with the above-referenced civil action alleging violations of the TMFPA by Defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc. The State of Texas intends to file its Complaint-In-Intervention within 90 days.

The State of Texas requests that the relator's Complaint, this Notice, the attached proposed Order, and all other previously-filed documents remain under seal until further order of the Court.

A proposed order accompanies this Notice.

Dated: October 29, 2021

Respectfully Submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

/s/ Raymond Charles Winter
RAYMOND C. WINTER
Chief, Civil Medicaid Fraud Division
Texas Bar No. 21791950
raymond.winter@oag.texas.gov
Direct Line: 512-936-1709

HALIE E. DANIELS
Texas Bar No. 24100169
halie.daniels@oag.texas.gov
Direct Line: 512-660-2970
Assistant Attorney General
General Litigation Division

P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

**ATTORNEYS FOR
THE STATE OF TEXAS**

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2021, a true and correct copy of the foregoing document was served on the following persons via electronic mail:

Yolonda Y. Campbell
Trial Attorney
Civil Division, Fraud Section
U.S. Department of Justice
Yolonda.Y.Campbell@usdoj.gov

Scott Hogan
Civil Chief
United States Attorney's Office
Northern District of Texas
Scott.Hogan@usdoj.gov

Nicholas J. Diez
Assistant Attorney General
Medicaid Fraud Control Unit
Office of Attorney General Jeff Landry
Attorney General of Louisiana
DiezN@ag.louisiana.gov

Andrew B. Stephens
Hacker Stephens, LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
Counsel for Relator
Andrew@HackerStephens.com

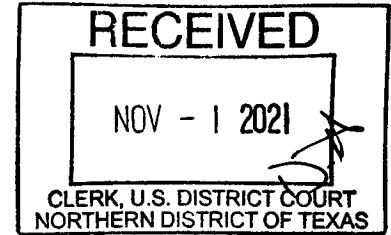
Heather Gebelin Hacker
Hacker Stephens, LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
Counsel for Relator
Heather@HackerStephens.com

/s/ Raymond Charles Winter
RAYMOND CHARLES WINTER



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

October 29, 2021



Via Federal Express

Karen Mitchell
Clerk of the Court
United States District Court
Northern District of Texas
205 SE 5th Avenue, Room 123
Box F-13249
Amarillo, Texas 79101-1559
Courtroom: 1st Floor
Case Letter Designation: (Z)

Re: State of Texas's Notice of Election to Intervene in **UNDER SEAL** case.

Civil Action No. 2:21-CV-022-Z, *In re: United States, et al. v. Planned Parenthood Federation of America, Inc., et al.* **FILED UNDER SEAL**

Dear Ms. Mitchell:

Enclosed please find the State of Texas's Notice of Election to Intervene and proposed order in the above-captioned under seal case.

Sincerely,

/s/ Raymond Charles Winter

Division Chief
Civil Medicaid Fraud Division
Office of the Attorney General of Texas
Phone: (512) 936-1709